



TNRCC REGULATORY GUIDANCE

Municipal Solid Waste Division

RG-87

September 1996

SUBJECT: Disposal of Grit Trap Wastes

Introduction

The Texas Natural Resource Conservation Commission (TNRCC) is dedicated to protecting human health and the environment by ensuring proper and safe disposal of various forms of pollutants consistent with sustainable economic development in the state. One way TNRCC carries out this mission is by regulating the management of solid waste in the state. This document provides guidance for generators, transporters, and processors of grit trap wastes to aid them in complying with state and federal regulations. (This guidance document does not replace any state or federal regulations that apply to grit trap wastes.)

What Are Grit Trap Wastes?

A "solid waste" may actually include discarded solid, liquid, semi-solid or contained gaseous materials. Special Wastes as referred to in Title 30, Texas Administrative Code (TAC) Section 330.2, are broadly defined as any solid waste or combination of solid wastes that because of its quantity, concentration, physical or chemical characteristics, or biological properties requires special handling and disposal to protect human health and the environment. Grit trap wastes, such as the sediment accumulated by car washes, wash racks, and other types of vehicle washing facilities, are listed as Special Wastes in the definition and require special handling. This is because grit trap wastes may be contaminated with hazardous substances or petroleum products.

Pollution Prevention

When disposing of grit trap wastes, liquid or solid, a primary concern is the possibility of petroleum-product contamination from the removal of oil and gas from vehicles or illegal dumping of hazardous waste, waste oil, or other waste petroleum products into the drain.

- The owners of vehicle wash stations are ultimately responsible for the waste removed from their grit traps and therefore should take whatever steps necessary to prevent illegal dumping.
- Owners/operators of unattended public vehicle wash stations are encouraged to alert their customers that dumping of waste oil and hazardous substances into the sewer system or on the ground is a crime punishable by penalties as prescribed by state law.
- Since waste oil and oil filters are prohibited from entering landfills, the TNRCC encourages collection of waste oil and oil filters for recycling and proper disposal. For more information on this and other recycling programs, please contact the TNRCC Office of Pollution Prevention and Recycling or the Clean Texas 2000 Hotline. (See page 4 for phone numbers.)

Subtitle D Regulations

The U.S. Environmental Protection Agency (EPA) has adopted a set of regulations, known as Subtitle D (Title 40, Code of Federal Regulations (CFR) Part 258), which prohibit municipal solid waste landfills from accepting liquid waste.

- Liquid waste is defined as any waste that is determined to contain free liquids using the Paint Filter Liquids Test (EPA Method 9095).

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- Some landfills have been approved to accept liquid waste for solidification/stabilization before disposal. A list of these facilities can be acquired through TNRCC's Municipal Solid Waste (MSW) Division, Permits Section.
- Small landfills that have applied for or received an "arid exemption" from Subtitle D requirements may continue to accept liquid waste until October 9, 1995. A list of these landfills is available from the MSW Permits Section.
- Grit trap wastes may also be managed by Municipal Solid Waste Type V-GG Facilities (see heading on this type of facility).

Dewatering of Waste

Rules are pending that allow generators of municipal grit trap wastes the option of dewatering their waste on-site provided they do not receive waste from other sites for dewatering.

- Dewatering may be achieved by evaporation or drainage; liquid waste may only be discharged into an approved wastewater disposal system.
- The solids remaining after dewatering are Special Waste and must be managed as a contaminated soil. Soils must be sampled at a rate of one composite for every fifty cubic yards of material.
- The discharge or imminent threat of discharge of grit trap wastes into or adjacent to the waters of the state is a violation of the Texas Water Code and the Texas Solid Waste Disposal Act.

Industrial Generators

Grit trap wastes originating from an industrial site or activity are subject to the industrial solid waste regulations found in Title 30 TAC 335. Generators are required to notify TNRCC of industrial activity by registering their facility with the Waste Evaluation Section of the Industrial and Hazardous Waste (IHW) Division. Generators of industrial waste must also classify their waste and assign a waste code in accordance with 30 TAC 335, Subchapter R. Waste which is Class 1 may only be disposed of in a facility approved to accept Class 1 waste or must be treated to levels of contamination suitable for municipal solid waste landfill disposal. A list of facilities approved to accept Class 1 waste may be found at the end of this document.

Transportation of Liquid Waste

Transporters of municipal grit and grease trap wastes must be registered with the TNRCC Watershed Management Division. If transporters wish to transport industrial Class 1 liquid wastes, they must be registered with the Industrial and Hazardous Waste Division. The transporter initiates and maintains a record of each individual collection and deposit. This record must be in the form of a trip ticket (manifest) or other similar documentation approved by TNRCC. The trip ticket must include:

- transporter's company name;
- transporter's agency registration number;
- generator name and address;
- date and time waste was collected;
- type and amount of waste collected or transported;
- name of responsible person(s) collecting, transporting, and depositing the waste;
- date and place where the waste was deposited;
- identification (permit application or site registration number, location, and operator) of the facility where the waste was deposited; and
- name and signature of facility representative acknowledging receipt of the waste and the amount of waste received.

Transporters of grit trap wastes are required to properly and correctly maintain records, trip tickets (manifests), and annual reports. Also, transporters are required to submit to the commission correct information by the required due date, on the annual summary

report and on the application for registration. Dumping of sludges or similar wastes at unauthorized disposal sites will be sufficient cause for the commission to void the transporter's registration and authorization to transport sludges and similar wastes. The commission may also take any other action authorized by law to secure compliance, including the assessment of administrative penalties or seeking of civil penalties as prescribed by law.

Regulations pertaining to the transportation of sludges and similar wastes are currently found in 30 TAC, Chapter 312, Subchapter G. Questions regarding transportation of liquid waste should be directed to the Permitting Section of the Watershed Management Division.

Type V-GG Processing Facilities

The TNRCC's MSW Permits Section also processes permit applications for facilities that process liquid wastes to make them suitable for discharge into an approved wastewater treatment facility. These are known as Type V Grit/Grease Trap (Type V-GG) Processing Facilities.

Currently there are nine permitted Type V-GG facilities in the state, with several more permits pending. This list is available through the MSW Permits Section. The solids generated by Type V-GG facilities are also Special Waste and may require special handling for disposal.

Landfill Disposal of Grit Trap Wastes

Municipal solid waste landfills are **not required to receive a written authorization** from the TNRCC for the receipt of grit trap wastes from municipal sources; however, they are not permitted to accept hazardous waste as defined in 40 CFR Part 261.

Hazardous waste generated by a Conditionally Exempt Small Quantity Generator (CESQG) may be accepted at a Type I municipal solid waste landfill without further approval from the Executive Director provided the amount of waste does not exceed 220 pounds (100 kilograms) per month per generator, and provided the landfill owner/operator is willing to accept the waste.

- If an owner/operator of a vehicle wash station or a transporter suspects that illegal dumping has occurred, and allows a municipal solid waste landfill to accept the waste, then the owner/operator and transporter may be liable for any corrective action necessary to remove the waste from the landfill.
- To prevent the receipt of unauthorized waste, municipal solid waste landfills are requiring periodic testing of grit trap wastes before acceptance. Ideally, every shipment of grit trap wastes should be tested. However, annual screening of the waste is more practical and may be sufficient.
- Municipal solid waste landfills may request analysis for lead, benzene and Total Petroleum Hydrocarbons (TPH) at a minimum, but each landfill may have its own requirements.

Analytical Limits for Disposal at a Municipal Solid Waste Landfill

Municipal solid waste landfills are limited in what they may receive. The following table shows contaminant levels established for municipal solid waste landfill disposal. Initial screening of the waste may be accomplished by analyzing for the total amount of a contaminant. When the total amount exceeds the stated limit, then the leachable amount must be determined using the Toxicity Characteristic Leaching Procedure (TCLP). Testing is permissible in this fashion in order to minimize the cost of testing for the individual generator.

Analytical Limits

Contaminant	Total Limit	TCLP Limit
Benzene	10 mg/kg ¹	0.5 mg/l ²
Lead	30 mg/kg	1.5 mg/l
TPH	600 mg/kg ³	not applicable

1. mg/kg = milligrams per kilogram

2. mg/l = milligrams per liter

3. The list of landfills that may accept grit trap wastes with elevated levels of petroleum-product contaminants is available from the Technical Assistance Team, Permits Section/MC 124, Municipal Solid Waste Division, P.O. Box 13087, Austin, Texas 78711-3087; Phone (512) 239-6781; Fax (512) 239-6717.

Illegal dumping of any hazardous waste into the drain of a vehicle wash station may cause the grit trap wastes to become hazardous and may require disposal in a permitted hazardous waste treatment, storage, or disposal facility.

Landfills Approved to Accept Class 1 Waste

- Texas Ecologists (hazardous waste facility), Robstown, Nueces County
- Rollins (hazardous waste facility), Deer Park, Harris County
- Chem Waste Management (hazardous waste facility), Port Arthur, Jefferson County
- BFI Gulfwestern (industrial solid waste landfill), Anahuac, Chambers County
- Western Waste (industrial solid waste landfill), Conroe, Montgomery County
- Laidlaw Environmental Services (municipal solid waste landfill), Altair, Colorado County
- CSC/Republic Waste (municipal solid waste landfill), Avalon, Ellis County
- BFI Waste Disposal Center (municipal solid waste landfill), Sinton, San Patricio County
- BFI-Itasca Landfill (municipal solid waste landfill), Itasca, Hill County
- Waste Management of Texas (municipal solid waste landfill), Humble, Harris County

Class 1 liquid wastes may also be disposed of in underground injection wells. For information on this means of disposal, please contact the Underground Injection Control Team of the Industrial and Hazardous Waste Division at (512) 239-6065.

Phone Numbers

The following is a list of TNRCC phone numbers for programs related to the management of grit trap wastes.

Municipal Solid Waste Division, Permits Section (512) 239-6781

Pollution Prevention and Recycling

Automotive Waste Recycling (512) 239-6750

Clean Texas 2000 Hotline (after you reach the hotline menu, press 1 for Used Oil and Recycling

information) (800) 64-TEXAS

Watershed Management Division, Permitting Section (512) 239-4436